



Comerica Bank

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Submitted Via Federal eRulemaking Portal – <http://www.regulations.gov>

June 2, 2011

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551

**Re: Proposed Rule on Availability of Funds and Collection of Checks, Docket No. R-1409 and
RIN No. 7100-AD68**

Dear Ms. Johnson:

We are writing to express to you our concurrence in the comment letter filed by the Electronic Check Clearing House Organization ("ECCHO") with your agency regarding the proposed Regulation CC rules. Comerica Incorporated is a bank holding company, headquartered in Dallas, Texas. Comerica Bank is a wholly owned subsidiary of Comerica Incorporated, and is a full service state member bank, based in Dallas, Texas, that operates more than 400 branches in the States of Arizona, California, Florida, Michigan and Texas. On behalf of Comerica Bank, Comerica Incorporated appreciates the opportunity to comment on this proposal by indicating our concurrence in the ECCHO letter.

Very truly yours,

DJ Culkar
Senior Vice President, Assistant General Counsel, and
Assistant Secretary